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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 ALLEN WILLIAM KOON,

14 Defendant.
15

Case No. 2:16-MJ-126-PAL

STIPULATION TO CONTINUE
PRELIMINARY HEARING
(Second Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
17 United States Attorney, and Lisa Cartier-Giroux, Assistant United States Attorney, counsel for
18 the United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel
19 Lazo, Assistant Federal Public Defender, counsel for Allen William Koon, that the Preliminary
20 Hearing currently scheduled on April 4, 2016, be vacated and continued to a date and time
21 convenient to the Court, but no earlier than thirty (30) days.
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1 This Stipulation is entered into for the following reasons:

2 1. The parties are in the process of negotiating a pre-indictment resolution.
3 Additional time is needed to finalize the terms of the agreement.

4 2. The defendant is incarcerated but does not object to the continuance.

5 3. Additionally, denial of this request for continuance could result in a
6 miscarriage of justice.

7 This is the second request for continuance filed herein.

8 DATED this 24th day of March, 2016.

9
10 RENE L. VALLADARES
Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

11
12 */s/ Raquel Lazo*
By _____
13 RAQUEL LAZO
14 Assistant Federal Public Defender

/s/ Lisa Cartier-Giroux
By _____
LISA CARTIER-GIROUX
Assistant United States Attorney

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALLEN WILLIAM KOON,

Defendant.

Case No. 2:16-MJ-126-PAL

ORDER

Based on the Stipulation of counsel and good cause appearing,
IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled
on April 4, 2016 at the hour of 4:00 p.m., be vacated and continued to May 5, 2016, at the
hour of 4:00 p.m.

DATED this 25th day of March, 2016.


UNITED STATES MAGISTRATE JUDGE